

U.S. ENVIRONMENTAL PROTECTION AGENCY
POLLUTION/SITUATION REPORT
Lawrence Hardware - Removal Polrep
Final Removal Polrep

US EPA RECORDS CENTER REGION 5



457116



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region V

Subject: POLREP #4
Final
Lawrence Hardware
C5X6
Sterling, IL
Latitude: 41.7864543 Longitude: -89.6937013

To: Bruce Everetts, Illinois EPA
Wayne Babcock, U.S. Department of Interior
Robert Burr, U.S. Department of Interior
Lindy Nelson, U.S. DOI
Carolyn Bohlen, U.S. EPA
Sam Borries, U.S. EPA
Yolanda Bouchee-Cureton, U.S. EPA
Mark Durno, U.S. EPA
Jason El-Zein, U.S. EPA
HQ EOC, U.S. EPA
Sherry Fielding, U.S. EPA
Charlie Gebien, U.S. EPA
John Glover, U.S. EPA
Sharon Jaffess, U.S. EPA
Matt Mankowski, U.S. EPA
Thomas Marks, U.S. EPA
Annette Trowbridge, U.S. Fish & Wildlife
Valencia Darby, Department of Interior
Watch Duty, FEMA
Marc Miller, Illinois DNR
Bud Bridgewater, Illinois EPA
Roger Lauder, Illinois EPA
Scott Shumard, City of Sterling
Kathleen Schnieders, ORC

From: Ramon Mendoza, On-Scene Coordinator
Date: 6/16/2014
Reporting Period: 5/9/2014 to 6/10/2014

1. Introduction

1.1 Background

Site Number:	C5X6	Contract Number:	
D.O. Number:		Action Memo Date:	
Response Authority:	CERCLA	Response Type:	Emergency
Response Lead:	EPA	Incident Category:	Removal Action
NPL Status:	Non NPL	Operable Unit:	
Mobilization Date:	5/1/2014	Start Date:	4/29/2014
Demob Date:	6/10/2014	Completion Date:	6/10/2014
CERCLIS ID:	ILN000501562	RCRIS ID:	
ERNS No.:		State Notification:	
FPN#:		Reimbursable Account #:	

1.1.1 Incident Category

Emergency

1.1.2 Site Description

The facility was operated by Lawrence Hardware, Inc. until 2006, when the Site was closed and abandoned. Lawrence Hardware, Inc. historically manufactured numerous products including metal door hinges, hinge pins, steel barn door hangers, bolted wheelbarrows, hay fork pulleys, and nails. On-site operations included wastewater treatment, plating, machining, and paper box manufacturing. The City of Sterling, Illinois acquired the Site through an involuntary taking due to delinquent taxes and is the current owner. The Site is part of a continued downtown development for the City of Sterling. The Site consists of one multi-story building that occupies approximately 3.5 acres and a railroad spur located north of the building. The Site is bordered to the north by a Union Pacific Railroad, with commercial and industrial properties and East 2nd Street beyond; to the east by undeveloped land; to the south by the Rock River with the City of Rock Falls, Illinois beyond; and to the west by 1st Avenue/Illinois Route 40 with industrial properties beyond.

1.1.2.1 Location

The Site is located at 2 1st Avenue, Sterling, Whiteside County, Illinois. **Figure 1-1** shows the Site location. The Site's approximate geographical coordinates are 41° 47'11.31" North latitude and 89°41'32.28" West longitude.

1.1.2.2 Description of Threat

1.1.3 Preliminary Removal Assessment/Removal Site Inspection Results

The Site was referred to EPA after fire fighters discovered hazardous waste in response to an arson fire caused by trespassers in August 2013. EPA conducted its site assessment in Dec. 2013 and documented the following:

At least two drums of Sulfuric acid, Lab waste including cyanide, containers of reactive waste, solvents, at least 12 drums of contaminated used oil;. The site assessment also noted the presence of very old transformers on-site. In addition there are at least two industrial size mercury switches.

On April 4, the City of Sterling reported another break-in by trespassers at the Site and EPA consequently decided to conduct an Emergency Removal action to prevent a release of hazardous substances to the community and to prevent anyone from being exposed to the hazardous substances on-site.

2. Current Activities

2.1 Operations Section

2.1.1 Narrative

The EPA OSC and Removal Contractor conducted a site walk-through to plan for the mobilization on 4/29/14. After one day of preparation and logistics EPA and ERRS contractors mobilized to the site on 5/1/14.

2.1.2 Response Actions to Date

Response actions From 5/1 through 5/5 are documented in Polreps #1 and #2

Response action from 5/6 to 5/8/2014 are documented in Polrep #3

From 5/9 to 6/7/2014 - ERRS contractor and OSC conducted the following off-site activities:

- Evaluated analytical results for waste profiles and soil characterization. The results from a composite soil sample, collected in May at the area where one transformer fell down and leaked (historical), were non-detect for PCBs. Consequently no soil removal or further action was undertaken.
- Waste Profiles were prepared and sent to disposal companies for bid.
- CERCLA approved disposal facilities were identified
- City of Sterling was kept informed of the situation.
- Schedule for pickup and disposal was arranged.

From 6/8 to 6/10/2014, the following onsite response actions were taken:

- From 6/8-9/2014, ERRS contractors remobilized to the Site (includes vehicles, personnel, skid steer, and rolloff box).; Cutup RCRA empty drums and prepared drummed waste for transport.
- On 6/10/2014, EPA OSC (Atkociunas) mobilized to the Site. In addition to review and

signing of the shipping manifests, he oversaw ERRS contractors as they completed the packing, loading, and transport off-site all previously inventoried solid and hazardous waste for disposal at CERCLA approved facilities. A small oil spill (1 quart) was discovered inside the container and was cleaned up. The leaking drums were overpacked. The mercury material was recycled.. All equipment and ERRS crew were demobilized the same day.

2.1.3 Enforcement Activities, Identity of Potentially Responsible Parties (PRPs)

- EPA is currently investigating the past ownership and operators of the Site.

2.1.4 Progress Metrics

The following waste streams have been collected, tested, consolidated, then transported and disposed (unless noted) off-site.

Waste Stream	Amount/Volume	Manifest #	Disposal Facility	Comments
Latex Paint	1 cubic yard Box	013010735 JJK	Petro-Chem Processing Group421 Lycaste Detroit, MI (PCPG)	
Acid Liquids	3-55 gallon drums	013010735 JJK	PCPG	
Neutral Liquids	2-55 gallon drums	013010735 JJK	PCPG	
Spray booth Filters	2-55 gallon drums in overpacks	013010735 JJK	PCPG	
Oxidizer Lab pack	1-5 gallon pail	013010735 JJK	PCPG	
Base liquids	1-55 gallon drum	013010735 JJK	PCPG	
Non-PCB Transformer Oil (< 50 ppm PCBs)	13-55 gallon drum	013010735 JJK	PCPG	
Contaminated Used Oil	11-55 gallon drums	013010735 JJK	PCPG	2 were leaking inside the steel container (1 quart spill) and were over-packed for transport (spill was cleaned up).

Viking Foam (Antifoam)	1-55 gallon drum	013010735 JJK	PCPG	
Boiler Cleaner	1-5 gallon pail	013010735 JJK	PCPG	
Ferrocyanide Lab Pack	1-5 gallon pail	013010735 JJK	PCPG	
Oil Base Paint	1 cubic yard box	013010735 JJK	PCPG	
Friable Asbestos Insulation	1- 5 gallon pail	013010735 JJK	PCPG	
Sodium Hydrosulfite	1-30 gallon drum	013010735 JJK	PCPG	Over-packed in a 55 gallon drum
RCRA Empty Containers and Solid Waste	1 ton (roll off box)	LH001	Republic Services Landfill, Dixon, IL	
Mercury Switches	Includes two industrial size switches and 5 home-sized switches (estimate 3-5 ounces).		Waste Management Mercury Solutions, Union Grove, WI	Elemental Mercury was recycled.

Regional Metrics

This is an Integrated River Assessment. The numbers should overlap.	Miles of river systems cleaned and/or restored	N/A
	Cubic yards of contaminated sediments removed and/or capped	N/A
	Gallons of oil/water recovered	715 gallons of PCB contaminated transformer oil and 605 gallons of contaminated used oils recovered.
	Acres of soil/sediment cleaned up in floodplains and riverbanks	N/A
Stand Alone Assessment	Number of contaminated residential yards cleaned up	Not applicable
	Number of workers on site	5
Contaminant(s) of Concern	Mercury, Ferrocyanide, Sulfuric acid, reactive (sodium hydrosulfite), PCB contaminated transformer oil, contaminated used oil, oxidizers	

Oil response Tracking

Estimated volume	Initial amount released	N/A
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	Final amount collected	N/A
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CANAPS Info	FPN Ceiling Amount	N/A
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	FPN Number	N/A
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	Body of Water affected (Rock River was threatened)	N/A
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Administrative and Logistical Factors (Check X where applicable)

q Precedent-Setting HQ Consultations (e.g., fracking, asbestos) (No	q Community challenges or high involvement, Yes. Trespassers and arson precipitated the need for ER under CERCLA	q Radiological - No.
q More than one PRP, Enforcement Investigation underway	q Endangered Species Act / Essential Fish Habitat issues, State Threatened mussels in Rock River are a receptor.	q Explosives, No.
q AOC, No	q Historic preservation issues, No.	q Residential impacts, downtown area of Sterling is mixed industry/residential.
q UAO, No	q NPL site, No	q Relocation, No
q DOJ involved, No	q Remote location, No.	q Drinking water impacted, No
q Criminal Investigation Division involved, No	q Extreme weather or abnormal field season, No	q Environmental justice, No.
q Tribal consultation or coordination or other issues, N/A	q Congressional involvement, No.	q High media interest, No.
q Statutory Exemption for \$2 Million, N/A	q Statutory Exemption for 1 Year, No.	q Active fire present, Yes (Arson and Threat of Arson.)
q Hazmat Entry Conducted – Level C	q Incident or Unified Command established No.	q Actual air release (not threatened), Yes, unknown haz substances, during arson fire in August. 2013.

2.2 Planning Section**2.2.1 Anticipated Activities****2.2.1.1 Planned Response Activities**

- 2.2.1.2 Next Steps

Notify the City and Illinois EPA of the completion of the emergency removal action.
Prepare an Action Memo for approval.

2.2.2 Issues

None.

2.3 Logistics Section

N/A

2.4 Finance Section

2.4.1 Narrative

ERRS Ceiling of \$50,000 was approved. To date, including pending costs, the total expended cost of ERRS contractors is at about \$49,953. Additional contractor funds are needed to close out the project (\$5000).

Estimated Costs *

	Budgeted	Total To Date	Remaining	% Remaining
Extramural Costs				
ERRS - Cleanup Contractor	\$50,000.00	\$49,953.00	\$47.00	0.09%
Intramural Costs				
Total Site Costs	\$50,000.00	\$49,953.00	\$47.00	0.09%

* The above accounting of expenditures is an estimate based on figures known to the OSC at the time this report was written. The OSC does not necessarily receive specific figures on final payments made to any contractor(s). Other financial data which the OSC must rely upon may not be entirely up-to-date. The cost accounting provided in this report does not necessarily represent an exact monetary figure which the government may include in any claim for cost recovery.

2.5 Other Command Staff

2.5.1 Safety Officer

All personnel read and signed the Site Specific Health and Safety Plan.

2.5.2 Liaison Officer

N/A

2.5.3 Information Officer

None at this time. No media interest as this time.

3. Participating Entities

3.1 Unified Command

None

3.2 Cooperating Agencies

City of Sterling
Illinois EPA

4. Personnel On Site

All Personnel demobed form the site permanently on 6/10/2014

5. Definition of Terms

No information available at this time.

6. Additional sources of information

No information available at this time.

7. Situational Reference Materials

No information available at this time.